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July 30, 2018

Mr. Andre Daugavietis (Via email only) Associate Regional Counsel U.S. Environmental Protection Agency, Region 5 77 West Jackson Boulevard, C-14J Chicago, IL 60604

Attn: Compliance Tracker, AE-18J (Via UPS Overnight Mail) Air Enforcement and Compliance Assurance Branch U.S. Environmental Protection Agency, Region 5 77 W. Jackson Boulevard Chicago, IL 60604

RE: Reliable Road Service, Inc.

Dear Mr. Daugavietis:

This letter is in response to the Clean Air Act § 208(a) information request ("Information Request") that you sent to Reliable Road Service, Inc. ("Reliable") dated June 25, 2018. As you know, I represent Reliable with respect this matter. Thank you for speaking with me on Wednesday, July 18, 2018. As we discussed, Reliable is a small business based in Holland, Michigan, that provides diesel repair services, sells truck parts, and provides specialty competition parts and services. Reliable has been working diligently to compile information responsive to your Information Request, but its ability to respond is necessarily impaired by its limited staff and administrative resources. Additionally, Jeremy Hassevoort, the individual at Reliable primarily responsible for responding to the EPA request, will be out of the office and essentially unreachable for approximately the next fourteen (14) days, beginning at the close of business today. Accordingly, we are formally requesting, pursuant to our conversation on or about July 18, 2018, an extension of forty-five (45) days by which to produce the information and documents requested, subject to the objections noted in our responses attached.

At this time, I am providing on behalf of Reliable an initial response to your Information Request. Specifically, **Appendix A**, **Appendix B** and **Appendix D** to this letter contain general and specific objections, as well as narrative and substantive responses to the Information Request items. I will supplement this response pursuant to my request for an extension as noted above, within the next forty-five (45) days, depending on how quickly Reliable can compile data and other information that may be relevant to the Information Request. Additionally, and again based on our July 18, 2018 conversation, it is my understanding as well that EPA does not object to Reliable producing information on a rolling basis in this manner.

Reliable's response includes a reference to Confidential Business Information ("CBI") protected under 42 U.S.C. §7542(c) and 40 C.F.R. Part 2, Subpart B. The CBI designation applies to Reliable's response to requests #10 and 11 of **Appendix B**. Protection of this information is necessary to preserve Reliable's competitive position in the diesel engine repair and competition market.

I am sending you an electronic courtesy copy of this letter, Appendix A, Appendix B, Exhibits 1 and 2, Appendix C, and Appendix D via email. You will also receive a hard copy of this portion of Reliable's response by overnight courier service. In accordance with your instructions, the hard copy will be addressed to the "Compliance Tracker, AE-18J" address.

Thank you for your cooperation on this matter. Reliable remains committed to complying with EPA's Information Request and will continue to work diligently to ensure it provides a complete response. Please contact me if you have any questions regarding this portion of Reliable's response to the Information Request.

Respectfully,

HOESCH & VANDER PLOEG, P.L.C.

Timothy A. Hbesch

TAH:bkb Enclosure

c: Reliable Road Service, Inc.

APPENDIX A TO RELIABLE ROAD SERVICE INC.'S JULY 30, 2018, RESPONSE TO EPA INFORMATION REQUEST

GENERAL OBJECTIONS AND RESERVATIONS

The following provides Reliable's initial narrative responses to certain items identified in EPA's June 25, 2018, Information Request. As detailed in the cover letter submitted with this letter, Reliable is continuing to review its records and expects to supplement this response. Consistent with the Information Request instructions, Reliable has repeated the text of each Information Request item, followed by its responses.

Below I have set forth Reliable's responses based on its understanding of the information EPA is seeking. However, nothing herein should be construed as an admission of liability on the part of Reliable. Reliable specifically reserves any and all defenses, claims, and rights related to the information sought by EPA, including but not limited to the right to supplement or clarify its responses to the Information Request.

Before providing its responses, Reliable hereby notes and reserves the following General Objections to the Information Request, and incorporates each General Objection into each of the written responses that follow:

- 1. Reliable objects to the Information Request, including the requests for production of documents contained therein, to the extent it seeks to impose upon Reliable obligations to investigate or respond that are different from, other than, inconsistent with, or beyond the scope of obligations imposed under section § 208(a).
- 2. Reliable objects to the Information Request, including the requests for production of documents contained therein, to the extent it seeks information that is not required to be furnished by section § 208(a), is outside the scope of the investigation authorized by section § 208(a), or is not relevant to the specific types of information specified in section § 208(a).
- 3. Reliable objects to the Information Request, including the requests for production of documents contained therein, to the extent that: (a) it is unreasonably broad; (b) it is unduly burdensome; (c) it is unreasonably vague or (d) it seeks information that could be as readily located and identified by the EPA as by Reliable.
- 4. Reliable objects to the Information Request, including the requests for production of documents contained therein, to the extent it seeks to impose on Reliable an obligation to seek or obtain information or documents from third persons or which otherwise are not in Reliable's possession, custody or control.
- 5. Reliable objects to the Information Request, including the requests for production of documents contained therein, to the extent that it seeks the disclosure of information or documents protected by the attorney-client privilege, the attorney work-product doctrine, the self-evaluation privilege, the right of privacy laws, the protection afforded trade secrets, or any other applicable privilege, protection or immunity.

6. Reliable objects to the Information Request, including the requests for production of documents contained therein, to the extent that it is arbitrary and capricious, an abuse of discretion, or otherwise not in accordance with the law as provided in § 208(a).

* * * * *

APPENDIX B TO RELIABLE ROAD SERVICE INC.'S JULY 30, 2018, RESPONSE TO EPA INFORMATION REQUEST

RESPONSES TO REQUESTS

Each response that follows is subject to the foregoing General Objections. In addition, Reliable has asserted Specific Objections to individual questions, which are stated in response to that particular question. Without waiving or limiting the General Objections or Specific Objections, Reliable has, to the best of its knowledge, responded to the Information Request as completely and accurately as possible. As noted previously, Reliable's review of EPA's Information Request is ongoing and it reserves the right to supplement and revise its responses.

Information Request Item No. 1(a):

- 1. In an electronic, unlocked spreadsheet list, by product number and identifying product name, each product (which includes services, as defined in Appendix A: Definitions, Paragraph Nos. 11 and 13) that:
 - (a) Defeats, deletes, deactivates, bypasses, renders inoperative, or allows for the removal of any emission control component, element of design, or emission related part including, but not limited to, the DPF system, EGR system, catalyst system, OBD, SCR (including DEF systems), or sensors, signals, or records related to such systems. This includes services performed on vehicles where emission control related parts or components had been previously modified as described above, and the work performed by Reliable related to and maintained the status of those previously modified parts or components (e.g., head gasket work on a vehicle where an EGR delete kit was previously installed and an OEM EGR was not re-installed on the engine);

Reliable's Response to Item No. 1(a): Reliable respectfully submits that there are two significant problems regarding Item No. 1(a) that greatly impair its ability to respond to this request. Each problem is addressed in turn.

The first problem relates to the initial sentence of Item No. 1(a). This sentence appears to ask for information concerning "defeat devices" and other emission-related devices <u>as applied to "motor vehicles.</u>" Reliable interprets the first sentence of Item 1(a) as focusing on products designed for "motor vehicles" based on its reference to concepts such as "defeat devices" and "emission control components." While these concepts may be relevant to "motor vehicles," they are not applicable to "competition vehicles" or "competition engines." As EPA has repeatedly recognized, "competition vehicles" and "competition engines" are not subject to the Clean Air Act. See Letter from Cynthia Giles, EPA Assistant Administrator for Enforcement and Compliance Assurance, to Nicholas W. Craw, President & CEO of the Automobile Competition Committee for the United States at 1 (May 13, 2016) (hereinafter referred to as the "Giles Letter") ("a great many vehicles used exclusively for competition in the United States are not subject to the Clean Air Act at all"). This includes "vehicles that begin their existence as normal, EPA-certified production vehicles used on public roads and are then permanently converted to sanctioned competition-use only vehicles." *Id*.

Because the first sentence of Item No. 1(a) references concepts applicable only to "motor vehicles," Reliable believes it is reasonable to interpret the first sentence as applying only to such vehicles. To the extent that is not the interpretation that EPA intended, Reliable objects to the first sentence of Item No. 1(a) as impermissibly vague. The first sentence is vague in part because it does not even acknowledge, let alone attempt to differentiate, between standards relevant to "competition vehicles" and "motor vehicles." EPA's failure to distinguish between these types of vehicles is troubling and confusing, given that the Clean Air Act explicitly acknowledges a distinction between "competition vehicles" and "motor vehicles." See 42 U.S.C. § 7550(11) (defining a "nonroad vehicle" as a vehicle that is not "a motor vehicle or a vehicle used solely for competition"); id. § 7550(10) (defining "nonroad engine" as an engine "that is not used in a motor vehicle or a vehicle used solely for competition"). Consistent with the Clean Air Act, EPA likewise has repeatedly recognized the difference between "competition vehicles" and "motor vehicles." See, e.g., Giles Letter at 1; see also EPA, Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium and Heavy-Duty Engines and Vehicles—Phase 2, 81 Fed. Reg. 73478, 73957 (Oct. 25, 2016) (hereinafter referred to as "2016 Heavy-Duty Engine Rule").

During the time period covered by the Information Request, Reliable has sold certain products designed and designated for use solely on competition vehicles or competition engines. Because the first sentence of Item No. 1 does not refer to competition vehicles or competition engines, Reliable interprets the first sentence as <u>not</u> seeking information about these products. Based on its understanding of the first sentence of Item No. 1(a), Reliable responds that it does not have any data to produce in response to Item No. 1, as it does not sell "defeat devices" or similar products for use on "motor vehicles."

The second problem relates to concepts that appear to be encompassed in the second sentence of Item No. 1(a). The second sentence, which begins, "This includes services performed . . . ", makes inaccurate assumptions regarding Reliable's business practices. Specifically, this sentence assumes that Reliable compiles records related to a vehicle's "emission control related parts or components" when it provides services wholly unrelated to those parts or components. Stated differently, and using the example found in the second sentence of Item No. 1(a), EPA appears to assume that Reliable compiles emission-related records when it performs head gasket work. This assumption is not consistent with Reliable's business practices. Reliable does not, as a general business practice, develop and maintain records on a vehicle's emission system when performing work on other parts of the vehicle. Reliable is not aware or any obligation requiring it to maintain such records, nor does it believe customers would pay for it to compile records on issues unrelated to the work that Reliable is performing. Accordingly, Reliable objects to the second sentence of Item No. 1(a) as impermissibly vague and based on factually incorrect assumptions. To the extent Reliable understands the second sentence of Item 1(a), at the present time it is not aware of any records responsive to this request.

Although it believes it does not have the type of records identified in either sentence of Item 1(a), Reliable interprets this request as seeking information about certain products it offers solely for use on competition engines or competition vehicles. Details regarding products that Reliable offers solely for competition use are provided later in this response. For purposes of Item 1(a), Reliable states that it offers the following products strictly for competition use as set forth on the attached **Exhibit 1**.

Reliable is continuing to review its files for any documents which may be responsive to this item, to the extent Reliable can understand it. To the extent that Reliable uncovers records which may be responsive to this request, it will produce such records in a supplemental response. Reliable also respectfully requests that EPA clarify or narrow the scope of Item 1(a) in light of the foregoing comments and objections. Reliable believes that such a narrowing or clarification might help it provide a supplemental response to EPA.

<u>Information Request Item No. 1(b)</u>:

(b) Simulates, or can be programmed to simulate, the operation of any emission control component and/or related parts including, but not limited to, the DPF system, EGR system, catalyst, OBD, SCR (including DEF systems), or sensors, signals, or records related to these systems; and/or

Reliable's Response to Item No. 1(b): As with the first sentence of Item No. 1(a), Item No. 1(b) appears to assume that Reliable sells "defeat devices" for use on "motor vehicles" and generally fails to distinguish between "motor vehicles" and "competition vehicles." Accordingly, Reliable incorporates by reference its response to the first sentence of Item No. 1(a). As with its response to Item No. 1(a), Reliable does not believe it has records responsive to this request (to the extent Reliable understands it). Also as with its response to Item No. 1(a), Reliable is continuing to review its files for records which may be responsive to this item and reserves the right to produce any such documents it discovers in a supplemental response. Also as with its response to Item No. 1(a), Reliable respectfully requests that EPA consider clarifying or narrowing the scope of Item No. 1(b) to help Reliable provide a supplemental response to EPA.

Information Request Item No. 1(c):

(c) Modifies, or can be programmed to modify, engine operating parameters, such as injection timing, fuel pressure, fuel quantity, and/or pulse width, emission control parameters, or OBD functions including, but not limited to, those parameters sensed or controlled by the ECM.

Reliable's Response to Item No. 1(c): Reliable incorporates by reference its responses to Item Nos. 1(a) and 1(b). Without waiving the objections and clarifications stated in response to Item Nos. 1(a) and 1(b) or its General Objections, Reliable responds that it offers the fuel-related products strictly for competition use as set forth on the attached **Exhibit 1**.

<u>Information Request Item No. 2:</u>

- 2. In an electronic, unlocked spreadsheet, for each product identified in response to Request 1 above, provide the following information:
 - (a) The product number;
 - (b) The identifying product name;
 - (c) The product manufacturer's name and address;

- (d) The product supplier's name and address (if different than manufacturer's) as listed on the shipping label(s) associated with the product's original packaging;
- (e) The type of vehicle for which the product is designed, used, or sold; including the vehicle make(s), vehicle model(s), vehicle model year(s), engine model(s), engine model year(s), and expected use(s);
- (f) A description of what the product does and how the product operates;
- (g) For each bullet below, indicate with a "yes" or "no" whether the product can:
 - i. alter, disable, or allow the removal of the EGR;
 - ii. alter, disable, or allow the removal of a DPF;
 - iii. alter, disable, or allow the removal of a catalyst;
 - iv. alter, disable, or allow the removal of a SCR system;
 - v. alter fuel timing maps within engine calibrations;
 - vi. alter engine calibrations for fuel injection pulse width;
 - vii. alter engine calibrations for fuel injection pressure;
 - viii. alter engine calibrations for air/fuel ratio during the combustion process;
 - ix. alter engine calibrations for fuel quantity (amount of fuel injected into the cylinder per stroke); ——
 - x. bypass or alter OBD parameters to prevent DTCs or MILs from being recorded or illuminated.
- (h) The quantity of product that was manufactured or produced by you for sale each calendar year (or partial year if full year not yet available);
- (i) The quantity of product that was offered for sale, and/or sold by you each calendar year (or partial year if full year not yet available); and
- (j) The quantity of product that was installed or performed by you each calendar year (or partial year if full year not yet available).

Reliable's Response to Item No. 2: Reliable incorporates by reference its responses to Item Nos. 1(a), 1(b), and 1(c).

Information Request Item Nos. 3(a) through 3(d):

- 3. For each product identified in response to Request 1 above, provide the following:
 - (a) A list of media and/or locations through/at which Reliable has advertised (e.g., website, social media, newspaper, flyers, verbal offers, trucking shows, conventions etc.), specifying the name of the media and/or date of truck show or convention;
 - (b) A list of the Universal Resource Locators (URLs) for any website or social media page that you use or have used to advertise any of the products and/or facilitate sales;

- (c) Copies of any advertisements to sell, distribute, or install each product, including advertisements on websites and in other media; and
- (d) Copies of any installation or operation instructions, guides, or manuals for each product.

Reliable's Response to Item No. 3:

- (a) Reliable's list of media is through its website with a link to PDI's website; the Great Lakes Big Rig Challenge in Onaway, Michigan from May 18-20, 2018, and Richard Crane Truck Show in St. Ignace, Michigan from September 14-16 2018;
- (b) http://reliablemobiletruck.com/; https://www.pdidiesel.com/; <a href="https://www.pdidiesel.
 - (c) Attached as Exhibit 2 are copies of Reliable's advertisements of PDI products; and
- (d) Copies of any installation or operation instructions, guides or manuals for each product is available by watching PDI's YouTube videos at:

https://www.youtube.com/watch?v=W0TOvPuXoCo.

Information Request Item Nos. 4(a) through 4(b):

- 4. For each product identified in response to Request 1 above, provide copies of all receipts or invoices, organized by calendar year, for any and all products that were:
 - (a) Manufactured by you;
 - (b) Purchased by you;
 - (c) Sold by you; and
 - (d) Installed or performed by you.

Reliable's Response to Item Nos. 4(a) through 4(d): Reliable objects to this request as vague, impermissibly broad, and unduly burdensome. As currently drafted, this request is so broad that Reliable likely would have to shut down its business and employ its staff full time simply to respond to the information that EPA appears to be requesting. Item No. 4 places such an unwarranted burden on Reliable due to the manner in which EPA has defined "product." The Information Request defines "product" as meaning "any service, part or component, or other item(s), including, but not limited, engine parts, block plates, straight pipes, power packages, computer tuning, calibrations, elements of design, tuners, tunes, software coding, or devices, that are manufactured (i.e., created, written, programmed, fabricated, produced, assembled or modified), purchased, imported, distributed, downloaded, offered for sale, sold, provided, and/or installed." Given this broad definition, Reliable would have to produce records on literally every business transaction it has completed since January 1, 2016, to June 25, 2018, in an attempt to provide a complete response to

this item. This request is impossible for Reliable to satisfy in part because Reliable does not maintain a centralized electronic database that covers "any and all products," as defined by EPA. In part due to its lack of a centralized system, responding to this item as it is currently drafted would require Reliable employees to review numerous paper and electronic records—a task that we believe would take many months and would have draconian financial consequences for Reliable. Given these circumstances, Reliable respectfully requests that EPA limit the scope of information sought in Item No. 4.

Information Request Item No. 5:

5. For each product identified in response to Request 1 above, provide any and all documentation that Reliable collected from customers to verify or ensure that any vehicles receiving the product from you are not for on-road use and are operated only off of public highways and/or roads.

Reliable's Response to Item No. 5: Reliable incorporates by reference its responses and objections to Item No. 1, as set forth above. Reliable further objects to this request as impermissibly vague due to its failure to employ terms that have legal meaning under the Clean Air Act, such as "nonroad" and "competition." Rather than using such terms, this request employs phrases such as "not for on-road use" and "operated only off of public highways and/or roads." EPA's Information Request does not define these phrases, leading to unnecessary confusion and hindering Reliable's ability to respond.

For purposes of this response, Reliable will construe Item No. 5 as seeking information concerning "competition vehicles," as EPA has used that term in other contexts. *See*, *e.g.*, Giles Letter at 1; 2016 Heavy-Duty Engine Rule, 81 Fed. Reg. at 73957.

During the time period covered by this request, Reliable has been a distributor for certain products manufactured by Performance Diesel, Inc. ("PDI"). Among other products, Reliable has distributed PDI products designed exclusively for competition use. As part of its partnership with PDI, Reliable follows procedures mandated by PDI to ensure that customers are purchasing competition products for use on competition vehicles. Specifically, and consistent with its agreement with PDI, Reliable requires customers to provide a fully completed and executed "Competition-Use Only Verification and Indemnity" ("Verification") before any competition-use only tunes can be downloaded from its cloud-based tuning system. Due to the nature of competition-use only vehicles, customers seeking installation of competition-use only products often ship an ECM to Reliable for reprogramming after it has been removed from the competition engine. Reliable will not reprogram an ECM without first receiving a fully completed and executed Verification from the customer documenting that it will only be used for a competition vehicle.

The Verification process explains the criteria for competition-use only engines and the regulatory consequences of converting an engine to competition-use. Purchasers are also advised that information about engine serial numbers, VINs, and personal information such as addresses will be retained and provided to EPA for purposes of verifying regulatory compliance. Purchasers are advised that regulatory violations or false statements on the Verification can result in civil and/or

criminal penalties. Purchasers also agree to indemnify PDI if they violate the terms of the Verification.

Reliable maintains copies of executed Verifications. It is Reliable's understanding that PDI also maintains copies of this documentation, as Reliable is required to upload the executed Verifications to PDI prior to installing competition products.

Given the foregoing background, Reliable interprets Item No. 5 as seeking copies of executed Verifications it currently maintains in its files and intends to provide them in its supplemental responses to EPA.

Information Request Item No. 6:

6. For each product identified in response to Request 1, indicate whether Reliable indicated to customers that the product is only for testing, maintenance, racing, off-road, or other restricted use, and provide a detailed description of the mechanisms, if any, that Reliable has implemented to ensure that the product is only used for such purposes, with any and all supporting documentation.

Reliable's Response to Item No. 6: Reliable incorporates by reference its responses to Item Nos. 1 and 5. For the reasons stated in those prior responses, Item No. 6 is unclear with regard to, among other things, the type of vehicle (e.g., "motor vehicle" or "competition vehicle") that is the focus of EPA's inquiry. To the extent EPA intends to ask about products for use in "competition vehicles," Reliable notes that its response to Item No. 5 provides a description of how it used the PDI Verification process to communicate with customers regarding the use of competition-related products.

Information Request Item No. 7:

- 7. For each product identified in response to Request 1 above, state whether you or any other entity conducted tests measuring emissions of hydrocarbons (HC), carbon monoxide (CO), NO_x, and/or PM, including tests that measure the impact of the product on a vehicle's emission control components or elements of design. For each test, provide the following:
 - (a) A description of the test, including identification of the component and vehicle, U.S. EPA engine family, name of the vehicle, test equipment, test protocols, and calibration procedures; and
 - (b) A copy of the test report which includes the date and location of the test, the name and position of the person who conducted the test, and the test results.

Reliable's Response to Item No. 7: Reliable incorporates by reference its response to Item No. 1. As stated in Reliable's response to Item No. 1, Reliable is not clear as to what products EPA is referring to with this request. To the extent EPA is referring to competition-only products, Reliable responds as follows:

During the time period covered by the Information Request, Reliable distributed competition-only products manufactured by PDI. Reliable did not distribute competition-only products manufactured by any other manufacturer. Reliable did not conduct emission tests on the PDI competition-only products that it distributed. Reliable understands that PDI may have engaged in testing regarding its products. To the extent EPA is seeking documents or information regarding the tests PDI performed, Reliable respectfully submits that PDI is proper entity to provide such documents and information.

Information Request Item No. 8:

8. For each product identified in response to Request 1 above, state whether you or the manufacturer submitted an application for an Executive Order to the California Air Resources Board and provide a copy of the application for each product. State whether each component received an Executive Order exempting the component from California's emission control system anti-tampering law, California Vehicle Code § 27156. If the component received an Executive Order, provide the Executive Order number and state whether the California Air Resources Board required you to change the component or application in order to receive approval.

Reliable's Response to Item No. 8: Reliable incorporates by reference its responses to Item Nos. 7 and 8. To the extent that EPA is asking about PDI products that Reliable distributed, including but not limited to competition-only products, Reliable responds as follows:

Reliable did not submit an application for an Executive Order to the California Air Resources Board ("CARB") with respect to the PDI products it distributed. It is Reliable's understanding that PDI has obtained Executive Orders covering certain PDI products. To the extent EPA is asking for documents or information related to PDI's dealings with CARB, Reliable respectfully submits that PDI is the proper entity to provide that information.

At this time, and based on its ongoing review of its records, Reliable can respond that it offers the following PDI products which, to the best of its knowledge, are covered by CARB Executive Orders.

Given the foregoing background, Reliable interprets Item No. 8 as seeking copies of Executive Order(s) to the California Air Resources Board it may and/or does maintain in its files and intents to provide it/them in its supplemental responses to EPA.

Information Request No. 9:

9. Provide the name and address of each location where you have stocked and/or are currently stocking each of the products identified in response to Request 1. The term "stocked" or "stocking" shall mean the temporary or long-term storage of materials for potential use, sale, or delivery. This definition includes, but is not limited to, the storage of materials within warehouses, vehicles, and/or shipping containers.

Reliable's Response to Item No. 9: Reliable Road Services, Inc., 1923 M-40, Holland, Michigan 49423.

Information Request No. 10:

10. Provide all receipts and/or invoices for work performed for Reliable by a third party on heavy duty diesel engine emission control devices including but not limited to the DPF system, EGR system, catalyst system, OBD, SCR (including DEF systems), or other emission control components such as associated fluids, sensors, signals, components, and control systems.

Reliable's Response to Item No. 10: Given and subject to its objections and responses set forth above, Reliable intends to provide these documents, subject to confidentiality claims pursuant to terms set forth in **Appendix C** and/or the Michigan Uniform Trade Secrets Act ("MUTSA"), MCL 445.1901, et. seq., in its supplemental responses to EPA.

Information Request No. 11:

11. Provide contacts and addresses of any and all Reliable offices, agents, subsidiaries or affiliates and the role and relationship of each such office, agent, subsidiary, and affiliate with respect to Reliable.

Reliable's Response to Item No. 11: Reliable objects to this request on the basis that it calls for legal conclusions, assumptions and conjecture with regard to certain terms used and definitions approved to such terms based on Michigan Statute and case law, which may be in contradiction to federal statute and/or case law. While Reliable affirmatively state that it only conducts business from one location, as set forth in Information Request No. 9, and further affirmatively states it has no "subsidiaries", it respectfully requests that EPA define the terms "agent," "agents," "affiliate," and "affiliates" as those terms are used in this request. Additionally, Reliable believes that once such definitions are provided by EPA, any supplemental responses provided by Reliable to this Information Request No. 11 is or may be subject, either in whole or in part, to assertions that the disclosure of such information contained therein will be subject to confidentiality claims pursuant to terms set forth in **Appendix C** and/or the Michigan Uniform Trade Secrets Act ("MUTSA"), MCL 445.1901 et seq.

Information Request No. 12:

12. Identify all persons consulted or who provided information in responding to this information request, including the title(s) of the individual and relationship to Reliable (e.g., employee, contractor) and the request(s) to which each individual responded or provided information.

Reliable's Response to Item No. 12: Jeremy Hassevoort, Secretary/Treasurer of Reliable; and Mike Scholten, Service Manager of Reliable.

EXHIBIT 1

E	art Number	
	16001	t.

<u>Application</u>

716001	Caterpillar HP Tung	Super
716701-1	Caterpillar 70 Pin	Stage 1 BXS/KCB ONLY
7161201-1	Caterpillar 120 Pin	Stage 1
7161201-3	Caterpillar 120 Pin	Stage 1
7161201-4	Caterpillar 120 Pin	Stage 1
715001	Cummins	Stage 1
715001-1	Cummins	Stage 1
715001-2	Cummins	Stage 1
715001-3	Cummins	Stage 1
715001-4	Cummins	Stage 1
715001-5	Cummins	Stage 1
715001-6	Cummins	Stage 1
	•	
714001	Detroit DDEC III-IV-V	Stage 1
714001-1	Detroit DDEC V	Stage 1
714001-2	Detroit DDEC V	Stage 1
714201-2	Detroit ODEC VI	Stage 1
714301	Detroit DD15/13-Mercedes MBE 4000/900	Stage 1
714301-1	Detroit DD15/13- Mercedes MBE 4000/900	Stage 1
714301-2	Detroit DD15/13- Mercedes MBE 4000/900	Stage 1
714601-1	Detroit DD15/16	Stage-1
714601-2	Detroit DD15/17	Stage-1
		-
713001	PACCAR MX 13 2010-2013 **Non-Common Rail**	STAGE 1 PMCI2
713001-1	PACCAR MX 13 2010-2013 **Non-Common Reli**	STAGE 1 PMCI2
713101	PACCAR MX 13 2013-2016 *Common Rall *	STAGE 1 PCI
713101-1	PACCAR MX 13 2013-2016 *Common Rail *	STAGE 1 PCI
719001	International Maxxforce	Stage 1
719001-1	International Maxxforce	Stage 1
		emge i
719101	International - DT466, DT570	Stage 1

50001

ECM Tune Insurance

BUILT ECM PRICING ADD \$2850 TO TUNE PRICE DETROIT ECMS WILL HAVE AN \$800 CORE CHARGE.

ECM RETUNE FEES

ADD A FEATURE WILL BE PRICE DIFFERENCE OF ORIGINAL AND NEW FEATURES or POWER AJUSTMENTS

FAILED ECM REFLASH CUSTOM TUNING

ALL TUNING IS FOR COMPETITION USE ONLY

CARB EOM

AG Ecm Tuning

Part Number	<u>Application</u>	
80001	Caterpillar Acert	Stage 1
80001-1	Caterpillar Acert	Stage 1
81001	John Deere	Stage 1
81001-1	John Deere	Stage 1
50001	ECM Tune Insurance	

Exhaust Manifolds

Part Number	<u>Description</u>	OEM Reference
2121	Cummins ISC Turbo Adapter	
2445	Cummins ISM Manifold	
3445	Cummins ISC Manifold	
3461	Caterpillar C15 ACERT Exhaust Manifold "Low Mount"	231-6127
3462	Caterpillar C15 ACERT Exhaust Manifold "Mid Mount"	231-3462
3465	Detroit DD15/DD16 Exhaust Manifold	
3468	Caterpillar C7 Exhaust Manifold T-4	219-5855 T-3 Stock
3470	Caterpiliar C13 Exhaust Manifold	
3471	Caterpillar C13 Acert Exhaust Manifold	250-4409
3489	Caterpillar C-12 Exhaust Manifold	115-2989
6114	Cummins N14 Exhaust Manifold	
7445	Cummins ISX Exhaust Manifold	
3445*	Detroit DDEC 3/4/5/6 Exhaust Manifold	Center 23532122
3445*	Caterpillar C15/Emodel Exhaust Manifold "Mid Mount"	146-9445
9446	Caterpillar C16/Emodel Exhaust Manifold "Low Mount"	150-1914 & 100-5694
3461C	Caterpillar C15 ACERT Coated Exhaust Manifold "Low Mount"	
3462C*	Caterpillar C15 ACERT Coated Exhaust Manifold *Mid Mount*	
3471C	Caterpillar C13 Acert Coated Exhaust Manifold	
3489C .	Caterpillar C12 Coated Exhaust Manifold	•
7445C	Cummins ISX Exhaust Manifold	
8445C*	Detroit DDEC 3/4/5/6 Coated Exhaust Manifold	
9445C	Caterpliar C15/Emodel Coated Exhaust Manifold	
9446C	Caterpillar C15/Emodel Coated Exhaust Manifold *Low Mount*	
3461EX	Caterpillar C15 ACERT Exhaust Manifold Extrude/Coated *Low Mount*	
3462EX	Caterpillar C15 ACERT Exhaust Manifold Extrude/Coated *Mid Mount*	
3471EX 3489EX	Caterpillar C13 Acert Exhaust Manifold Extrude/Coated	
7445EX	Caterpillar C12 Exhaust Manifold Extrude/Coated Cummins ISX Exhaust Manifold Extrude/Coated	
8445EX	Detroit DDEC 3/4/5/6 Exhaust Manifold Extrude/Coated	
9445EX	Caterpillar C15/Emodel Exhaust Manifold Extrade/Coated	
9446EX	Caterplilar C15/Emodel Exhaust Manifold Extrude/Coated *Low Mount*	
346312V	Dodge 12 Valve Exhaust Manifold	
346512WF	Dodge 12 Valve Exhaust Manifold (T-4 Flange)	
346424V	Dodge 24 Valve Exhaust Manifold	
346524WF	Dodge 24 Valve Exhaust Manifold (T-4 Flange)	
3466CR	Dodge 5.9 Common Rall Manifold	
Intake Manifolds		
6445	Cummins ISX intake Manifold CM870	
6447	Cummins ISX Intake Manifold CM871	
Stud Kits	•	
720010	10MM Stud and Nut Kit	
720012	12mm Turbo Stud and Nut Set	

^{*}Designates CARB EO Product

Turbos

	ruipos
Part Number	<u> Pescription</u>
Caterpillar	
720001	Big Boss Turbo
716850	Cat C15 Stage 3 Turbo
716000	Cat C15 Stage 4 Turbo
716548	Cat C15 Compound Turbo Kit
716700	Cat C12 Stage 2 C12 Turbo
716601	Cat C13/ C12 Stage 1 Turbo
716300	Cat C7 Stage 1 Turbo
Detroit	
714600	Stage 1
720014	Big Boss Detroit Turbo - Stage 1
714601	Stage 1 DD15/DD16
714548	Detroit Performance Compound Turbo Kit
Cummins	
715500	Cummins ISX Stage 1 Turbo
720001	Blg Boss Turbo
715548	Cummins ISX Performance Compound Turbo Kit
715072	Stage 1 ISM Turbo
715489	Stage 1 ISL Turbo
715483	Stage 1 ISC/PX8 Turbo
715367	Stage 1 ISB/PX6 Turbo
715895-15	Cummins ISX CM2250/2350 Compound Turbo Kit with 1.15AR
715895-45	, Cummins ISX CM2250/2350 Compound Turbo Kit with 1.45AR
715896-16	Cummins X15 Compound Turbo Kit with 1.15AR
715896-45	Cummins X15 Compound Turbo Kit with 1.45AR
Dit Caps	•
i92481	Caterplifar Billet Aluminum Cap (SDP)
716481	Caterpillar Billet Aluminum Cap and Oil tube (1994-2010)
592462	Cummins Billet Aluminum Cap (ISX CM2250, CM2350)
urbo Install Kits	
715260K	Cummins / Detroit 6"X5.5" Boot Kit
16261K	Cummins / Detroit 6"X5" Boot Kit
15262K	6"X6" Boot Kit
116263K	Cummins / Detroit 5.5"X5" Boot Kit
16260K	90° Elbow Kit
Orain Assemblies	
14372	PDI Drain Tube Assembly DDEC 3/4/5 60 Series
14373	PDI Drain Tube Assembly DDEC 6- 60 Series
15372	PDI Drain Tube Assembly ISX
16373	PDI Drain Tube Assembly Emodel/C15- Stage 1
16372	PDI Drain Tube Assembly Emodel/C15 - Nozzle Ring
16374	PDI Drain Tube Assembly Emodel/C15 - SDP
16376	PDI Drain Tube Assembly Emodel/C-13 KCB
16376	PDI Drain Tube Assembly Emodel/C-13 LEE
)){ Supply	•
112085G1	ISX Oil Supply Line
112085P2	ISX OII Supply Line Adaptor
113028G1	Cat Supply Line

Part Number	<u>Description</u>
2121K	Cummins ISC Adapter Install Kit
2445KD	Cummins ISM Manifold Install Kit
3445K	Cummins ISC Manifold Install Kit
3455K	Cummins ISB Manifold Install Kit
6114K	Cummins N-14 Install Kit
3461K	**Same as 3462K**
3462K	Caterpillar Acert C15 Install Kit
3465K	DD15/DD16 Manifold Install Kit
3468K	Caterpillar C7 Kit
3470K-1	Caterpillar C13 Kit W/90* Elbow
3470K-2	Caterpillar C13 Kit W/45* Elbow
3470K-3	Caterpillar C13 LEE Install Kit W/90* Elbow
3470K-4	Caterpillar C13 LEE Install Kit W/45* Elbow
3471K	Caterpillar C13 Acert Exhaust Manifold Install Kit
3489K	Caterpillar C-12 Exhaust Manifold Install Kit
715257KS	Cummins ISC/ISB Kit
715257KU	Cummins ISC/ISB Kit
715258K	Cummins ISX
715259K	Cummins ISX
715259KS	Cummins ISX
7445K	ISX Cummins Manifold Install Kit
7445KD	ISX Install Kit CM871
7445KE	ISX Install Kit CM870
7445KS	ISX Install Kit CM2250/2350
8445K-1	Detroit Install Kit Stage 1 Turbo
8445K-2	Detroit Install Kit Stage 2 Turbo
8445K-3	Detroit Install Kit
9445K	Caterpillar Emodel/C15
716015	Caterpillar install Kit MXS/NXS/BXS ***Requires 777EX/888EX***
716737	Caterpillar Install Kit ***Requires 777EX/888EX***
714347K	Detroit Kit DDEC 5
714348K	Detroit Kit DDEC 6
Kit-87828	ISX Oil Thermostat Kit (Thermostat, O-ring, and Retianer ring)
Kit-87828G	ISX Oil Thermostat Kit

Vibration Dampers

Dampers	Engine Model	
Cummins		
709965-000	NTC335 TAPER / 855	
713396-000	NTC / NTA / FFC 400-475 / 855	
715285-000	NTC290-350 / 855	•
715300-000	NTC335-FFC / INTERIM K6 / K19 / 855	
DAP-718018-300	N14	
718028-300	NTC290-350 / 855 (w / timing marks)	
718030-100	КТАЗВ	
718031-600	KTA50	
718036-300	NTC290-350 / 855 (w / timing marks)	
718038-300	NTC 290-350 / 855 (modified hole pattern)	
DAP- 718041-600	ISX	
CAT		
712020-001	D / G379 / 398 / 399	
715452-000	3306 / 330C / 3304 / 333C	
715462-000	D 343 / D 346	
DAP-718405-000	C15 / C16 / 3408 / 3406 (A,B,C,E,PC) Adapter plate Incl.	**Will not work on SDP Engines**
DAP-716405-000 718019-600	C15 / C16 / 3408 / 3406 (A,B,C,E,PC) Adapter plate Incl. 3500 Series	**Will not work on SDP Engines**
		Will not work on SDP Engines
718019-600	3500 Series	**Will not work on SDP Engines**
718019-600 DAP-716164	3500 Series C10/C12/C13	**Will not work on SDP Engines**
718019-600 <i>DAP-716164</i> <u>Detroit</u>	3500 Series	**Will not work on SDP Engines**
718019-600 <i>DAP-716164</i> <u>Detroit</u> 708915-000	3500 Series C10/C12/C13	**Will not work on SDP Engines**
718019-600 DAP-716164 Detroit 708915-000 709815-000	3500 Series C10/C12/C13 16V149 16V92 / 16V71	**Will not work on SDP Engines**
718019-600 DAP-716164 Detroit 708915-000 709815-000 710240-001	3500 Series C10/C12/C13 16V149 16V92 / 16V71 12V71	**Will not work on SDP Engines**
718019-600 DAP-716164 Detroit 708915-000 709815-000 710240-001 711060-000	3500 Series C10/C12/C13 16V149 16V92 / 16V71 12V71 16V92	**Will not work on SDP Engines**
718019-600 DAP-716164 Detroit 708915-000 709815-000 710240-001 711060-000 712935-060	3500 Series C10/C12/C13 16V149 16V92 / 16V71 12V71 16V92 8V92	**Will not work on SDP Engines**
718019-600 DAP-716164 Detroit 708915-000 709815-000 710240-001 711060-000 712935-060 712935-300	3500 Series C10/C12/C13 16V149 16V92 / 16V71 12V71 16V92 8V92 6-71 / 12V71 / 8.2 L	**Will not work on SDP Engines**
718019-600 DAP-716164 Detroit 708915-000 709815-000 710240-001 711060-000 712935-060 712935-300 713393-000	3500 Series C10/C12/C13 16V149 16V92 / 16V71 12V71 16V92 8V92 6-71 / 12V71 / 8.2 L 6-71 / 12V71 / 12V149	**Will not work on SDP Engines**
718019-600 DAP-716164 Detroit 708915-000 709815-000 710240-001 711060-000 712935-060 712935-300 713393-000 713398-000	3500 Series C10/C12/C13 16V149 16V92 / 16V71 12V71 16V92 8V92 6-71 / 12V71 / 8.2 L 6-71 / 12V71 / 12V149 4 CYL. 71	**Will not work on SDP Engines**
718019-600 DAP-716164 Detroit 708915-000 710240-001 711060-000 712935-060 712935-300 713393-000 713398-000 715015-000	3500 Series C10/C12/C13 16V149 16V92 / 16V71 12V71 16V92 8V92 6-71 / 12V71 / 8.2 L 6-71 / 12V71 / 12V149 4 CYL. 71 8V71 / 8V92 / 12V149	**Will not work on SDP Engines**
718019-600 DAP-716164 Petroit 708915-000 709815-000 710240-001 711060-000 712935-060 712935-300 713393-000 713398-000 715015-000 715085-000 715885-000	3500 Series C10/C12/C13 16V149 16V92 / 16V71 12V71 16V92 8V92 6-71 / 12V71 / 8.2 L 6-71 / 12V71 / 12V149 4 CYL. 71 8V71 / 8V92 / 12V149 20V149	**Will not work on SDP Engines**
718019-600 DAP-716164 Detroit 708915-000 709815-000 710240-001 711060-000 712935-300 712935-300 713393-000 713398-000 715015-000 715458-000	3500 Series C10/C12/C13 16V149 16V92 / 16V71 12V71 16V92 8V92 6-71 / 12V71 / 8.2 L 6-71 / 12V71 / 12V149 4 CYL. 71 8V71 / 8V92 / 12V149 20V149 12V71	**Will not work on SDP Engines**

Intercoolers

Part Number	<u>Description</u>
800370	Peterbilt 379
800536	Kenworth W900
800236	Freightliner Century
KEDAC-12BA	Kenworth W900 Older Stock Replacement
KEDAC-12D	Kenworth W900 08-2010 Stock Replacement
PEDAC-20BA	Peterbilt 379 Stock Replacement
PEDAC-20K	Peterbilt 389 Stock Replacement

Mufflers

Part Number

Description

900101

Stack Muffler

Downpipes

715EX

Cummins Downpipe for Peterbilt

716EX

Caterpillar Downpipe for Peterbilt

888EX

Cummins Downpipe for Kenworth

Camshafts

<u>Part Number</u>

Description

CAM-7162261* Stage 1 Caterpillar Cam

CAM-7162262* Stage 2 Caterpillar Cam

CAM-7142261 Stage 1 Detroit Cam

CAM-7142262 Stage 2 Detroit Cam

CAM-7151111 Cummins Cam

*DO NOT INSTALL IN C-15 ACERT- SDP and BXS

Clutches

Part Number

Description

CLT-428258 2450FT/LB

KIT-428258K PDI Clutch Install Kit

258825

Custom Clutch

Radiators

<u>Part</u>	
Number	Description
7231002	Peterbilt 379 Surge Tank on Firewall
7231000	Peterbilt 379 Surge Tank on Radiator
7231201	Kenworth W900
7231200	Kenworth W900 Four Bolt Center Flange

Pyro & Boost Gauges

<u>Description</u>
2-1/16" Pyrometer - All Makes (Red)
2-1/16" Pyrometer - Peterbilt Only (Red)
2-1/16" Pyrometer - Kenworth Only (Red)
2-1/16" Pyrometer - All Makes (Blue)
2-1/16" Pyrometer - Peterbilt Only (Blue)
2-1/16" Pyrometer - Kenworth Only (Blue)
Turbo Boost - All Makes (Red)
Turbo Boost - Peterbilt Only (Red)
Turbo Boost - Kenworth Only (Red)
Turbo Boost - All Makes (Blue)
Turbo Boost - Peterbilt Only (Blue)
Turbo Boost - Kenworth Only (Blue)

EXHIBIT 2

West Michigan 24 Hour Truck Repair

Welcome to Reliable Road Service Inc.

Posted on June 10, 2011 by



Thank you for choosing Reliable Road Service Inc., your full service in-house and 24 hr mobile repair provider. We specialize in Towing / Truck / Trailer / Tire Service and Repair for the West Michigan area including Grand Rapids, Holland, Kalamazoo and surrounding areas.

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-Light Duty Flat Bed wrecker

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-Our Tire truck can service any size tire for trucks, trailers, cars, light duty trucks, farm equipment, etc.

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Reliable Road Service 1923 M-40 (Lincoln Road) Holland, MI 49423

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Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 208 of the CAA, 42 U.S.C. § 7542, is not entitled to confidential treatment under 40 C.F.R. Part 2.

"Emission data" means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as "trade secret" or "proprietary" or "company confidential" and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 208(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the information request as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information Is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show: that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential by page, paragraph and sentence. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

- 1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
- 2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
- 3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
- 4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
- 5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
- 6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

- 7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
- 8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

APPENDIX D

STATEMENT OF CERTIFICATION

You are submitting the enclosed documents in response to the U.S. Environmental Agency's ("EPA") Request for Information, issued pursuant to Section 208(a) of the Clean Air Act, to determine compliance with the Clean Air Act and its implementing regulations.

I certify that I am fully authorized by Reliable Road Service, Inc. to provide the above information on its behalf to EPA.

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to 18 U.S.C. §§ 1001 and 1341.

Date:	July 30, 2018
Name (Printed):	Jeremy Hassevoort
Signature:	1/2
Title:	Secretary/Treasurer